Anwar et al v. Fairfield Greenwich Limited et al Doc. 130

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANWAR et al.

Plaintiffs,

- against –

FAIRFIELD GREENWICH LIMITED et al.

Defendants.

Consolidated Case
Docket No. 09 CV 00118 (VM)

NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the annexed Declaration of Gustavo Bruckner, Memorandum of Law, and (Proposed) Order, movants, The Knight Services Holdings Limited and the Americas/SwissCo. Trusts, will move this Court located at the Courthouse, 500 Pearl Street, New York, New York 10007, as soon as counsel may be heard for an Order pursuant to the Private Securities Litigation Reform Act of 1995 ("PSLRA"), for their appointment to serve as Lead Plaintiffs on behalf of all persons or entities who acquired shares of Fairfield Sentry Limited, between March 11, 2004 and December 10, 2008, inclusive, seeking to pursue remedies under the Securities Exchange Act of 1934, and for the approval of movants' choice of the law firm of Wolf Haldenstein Adler Freeman & Herz LLP as Lead Counsel.

PLEASE TAKE FURTHER NOTICE, that The Knight Services Holdings Limited and the Americas/SwissCo. Trusts, as the proposed Lead Plaintiffs for the Class, have timely filed their motion and, pursuant to the PSLRA, are the most adequate Lead Plaintiffs. Movants satisfy the requirements of the PSLRA and Rule 23 of the Federal Rules of Civil Procedure in that their claims are typical of the claims of the Class, and they will fairly and adequately represent the

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interests of the Class. Movants' choice of counsel should be accepted by this Court because it is a nationally recognized firm with extensive experience and expertise in securities fraud and other class actions.

Dated: May 11, 2009

Respectfully submitted,

WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP

By: /s/_________________

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